

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TALITHA KINCADE BROUGHTON,	:	
Plaintiff,	:	
	:	
v.	:	CAFN: 1:22-CV-04229-ELR
	:	
WALMART, INC.,	:	
Defendant,	:	

**PLAINTIFF’S MOTION FOR AN ORDER PERMITTING COUNSEL,
PLAINTIFF AND WITNESS TIMOTHY SHELTON TO POSSESS AND
UTILIZE ELECTRONIC DEVICES AT TRIAL**

COMES NOW Plaintiff Talitha Kincade Broughton, and moves this Court for an Order permitting Plaintiff, her counsel and his staff, and witness Timothy Shelton to possess certain electronic devices, and file and exhibit boxes during trial. More specifically, Plaintiff requests the following:

1.

Plaintiff requests that her attorney Christopher S. Harris and his assistant Tram Vu-Phlong be permitted to each possess and use their cellular phones, laptops and external drives (with accompanying charging devices or cables) during trial.

2.

That Plaintiff Talitha Kincade Broughton be permitted to possess her cellular phone during trial.

3.

That Plaintiff's attorney Christopher S. Harris be permitted to bring up to three (3) banker's boxes of documents to be used during trial.

4.

That Timothy Shelton, Plaintiff's witness, be permitting to possess and bring files and records to use as reference, his cellular phone, laptop and/or tablet (with accompanying charging devices or cables) for use as necessary during trial.

Respectfully submitted this May 7, 2024.

/s/ Christopher S. Harris
Georgia Bar No. 135243
The Law Firm of Harris & Harris, LLC
P.O. Box 679
Palmetto, Georgia 30268
770-632-8988
harrisandharrislaw@gmail.com

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(D)

Pursuant to L.R. 5.1(C), N.D. Ga., I hereby certify that the foregoing pleadings has been prepared with Times New Roman 14 point font.

This May 7, 2024.

/s/ Christopher S. Harris
Georgia Bar No. 135243
The Law Firm of Harris & Harris, LLC
P.O. Box 679
Palmetto, Georgia 30268
770-632-8988
harrisandharrislaw@gmail.com

CERTIFICATE OF SERVICE

This is to certify that I have served counselors for the Defendant in this case in accordance with notice of electronic filing (NEF) which was generated as a result of electronic filing in this court to:

Matthew J. Hurst
Walden Adelman Castilla Hiestand and Prout
900 Circle 75 Parkway, Suite 1040
Atlanta, Georgia 30339
mhurst@waldonadelman.com and jadelman@wachp.com

This May 7, 2024.

/s/ Christopher S. Harris
Georgia Bar No. 135243
Attorney for the Plaintiff

The Law Firm of Harris & Harris, LLC
P.O. Box 679
Palmetto, Georgia 30268
770-632-8988
harrisandharrislaw@gmail.com